

MEMO ENDORSED

DEWEY & LeBOEUF

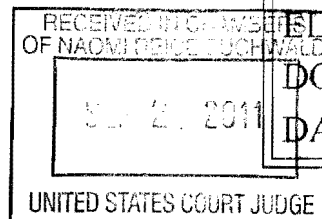
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September 26, 2011

Via Hand Delivery

Honorable Naomi Reice Buchwald
United States District Judge
United States Courthouse
500 Pearl Street
New York, NY 10007-1312



USDC SDNY
DOCUMENT

ELECTRONICALLY FILED

DOC #:

DATE FILED: 9/28/11

Re: *The Royal Bank of Scotland N.V., Movant, v. James W. Giddens, as Trustee, Respondent (In re Lehman Brothers Inc.)*, Case No. 11 Civ. 05709 (NRB)

Dear Judge Buchwald:

Dewey & LeBoeuf LLP are attorneys for The Royal Bank of Scotland N.V. ("RBS N.V.") in the above-referenced proceeding for an order withdrawing the reference (the "Motion to Withdraw the Reference") of an action to collect approximately \$345 million brought by James W. Giddens, trustee for the Securities Investor Protection Act liquidation of Lehman Brothers Inc., in the United States Bankruptcy Court for the Southern District of New York in *In re Lehman Brothers Inc.*, Bankr. Case No. 08-01420 (JMP).

Pursuant to the Court's Individual Rules of Practice, RBS N.V. respectfully requests permission to file a 13-page reply memorandum in support of the Motion to Withdraw the Reference so that it may address the LBI Trustee's 33-page response and Judge Koeltl's September 14, 2011 bench decision in *Mich. State Housing Dev. Auth. v. Lehman Brothers Derivative Products, Inc.*, No. 11-cv-3392 (JGK). Counsel for the LBI Trustee has advised RBS N.V. that he does not object to this request.

In addition, pursuant to the Court's Individual Rules of Practice, RBS N.V. respectfully requests oral argument with respect to the Motion to Withdraw the Reference at a time agreeable to the Court, the LBI Trustee, and RBS N.V.

MEMO ENDORSED

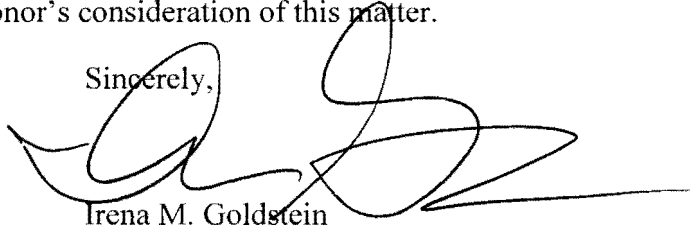
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Honorable Naomi Reice Buchwald
United States District Judge
September 26, 2011
Page 2 of 2

Thank you for Your Honor's consideration of this matter.

Sincerely,

A handwritten signature in black ink, appearing to be 'Irena M. Goldstein', with a long horizontal flourish extending to the right.

Irena M. Goldstein

cc: Richard G. Menaker (via e-mail)
Samuel F. Abernethy (via e-mail)
Steven J. Purcell (via e-mail)
Karen Kim (via e-mail)